

ORIGINAL

Approved: Step LSTEPHANIE LAKE/DINA MCLEOD
Assistant United States Attorneys

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Before: THE HONORABLE JAMES C. FRANCIS IV
United States Magistrate Judge
Southern District of New York

UNITED STATES OF AMERICA

- v. -

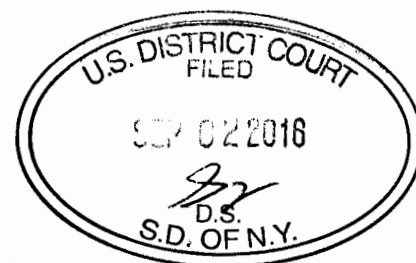
MARIA SOLY ALMONTE,
a/k/a "Soly Almonte,"
a/k/a "Soly La Fuerte,"
a/k/a "SoSo,"
a/k/a "SoSo Wavy,"
a/k/a "Soly Montana,"
VETTHYA ALCIUS,
a/k/a "Theiya Cole,"
DAWITT DYKES,
a/k/a "Daweezy,"
a/k/a "Dawezzy,"
MARIA MAGDALENA ALMONTE,
DARLENE DELEON, and
GABRIELY M. JOSE,
a/k/a "Gabriela Vuitton,"
a/k/a "Gabby,"

Defendants.

SEALED COMPLAINT

Violations of 18
U.S.C. §§ 1591,
1594(c), 1952(a)(3),
2252A, 2422(b), and 2

COUNTY OF OFFENSE:
BRONX



DOCS

SOUTHERN DISTRICT OF NEW YORK, ss.:

EVAN NICHOLAS, being duly sworn, deposes and says that he is a Special Agent with the Federal Bureau of Investigation ("FBI"), and charges as follows:

COUNT ONE

(Sex Trafficking Conspiracy)

1. In or about 2015, in the Southern District of New York and elsewhere, MARIA SOLY ALMONTE, a/k/a "Soly Almonte," a/k/a "Soly La Fuerte," a/k/a "SoSo," a/k/a "SoSo Wavy," a/k/a "Soly Montana," VETTHYA ALCIUS, a/k/a "Theiya Cole," DAWITT DYKES, a/k/a "Daweezy," a/k/a "Dawezzy," DARLENE DELEON, and GABRIELY

M. JOSE, a/k/a "Gabriela Vuitton," a/k/a "Gabby," the defendants, and others known and unknown, willfully and knowingly did combine, conspire, confederate, and agree together and with each other to commit sex trafficking, in violation of Title 18, United States Code, Sections 1591(a) and (b).

2. It was a part and an object of the conspiracy that MARIA SOLY ALMONTE, a/k/a "Soly Almonte," a/k/a "Soly La Fuerte," a/k/a "SoSo," a/k/a "SoSo Wavy," a/k/a "Soly Montana," VETTHYA ALCIUS, a/k/a "Theiya Cole," DAWITT DYKES, a/k/a "Daweezy," a/k/a "Dawezzy," DARLENE DELEON, and GABRIELY M. JOSE, a/k/a "Gabriela Vuitton," a/k/a "Gabby," the defendants, and others known and unknown, would and did, in and affecting interstate and foreign commerce, recruit, entice, harbor, transport, provide, obtain, advertise, maintain, patronize, and solicit by any means a person, and benefit, financially and by receiving anything of value, from participation in a venture which had engaged in any such act, and having had a reasonable opportunity to observe such person, knowing and in reckless disregard of the fact that means of force, threats of force, fraud, and coercion described in Title 18, United States Code, Section 1591(e)(2), and any combination of such means would be used to cause the person to engage in a commercial sex act, and that the person recruited, enticed, harbored, transported, provided, obtained, advertised, patronized, and solicited had not attained the age of 14 years at the time of such offense, in violation of Title 18, United States Code, Sections 1591(a), (b)(1), and (c).

3. It was a further part and an object of the conspiracy that MARIA SOLY ALMONTE, a/k/a "Soly Almonte," a/k/a "Soly La Fuerte," a/k/a "SoSo," a/k/a "SoSo Wavy," a/k/a "Soly Montana," VETTHYA ALCIUS, a/k/a "Theiya Cole," DAWITT DYKES, a/k/a "Daweezy," a/k/a "Dawezzy," DARLENE DELEON, and GABRIELY M. JOSE, a/k/a "Gabriela Vuitton," a/k/a "Gabby," the defendants, and others known and unknown, would and did, in and affecting interstate and foreign commerce, recruit, entice, harbor, transport, provide, obtain, advertise, maintain, patronize, and solicit by any means a person, and benefit, financially and by receiving anything of value, from participation in a venture which had engaged in any such act, and having had a reasonable opportunity to observe such person, knowing and in reckless disregard of the fact that the person had not attained the age of 18 years and would be caused to engage in a commercial sex

act, in violation of Title 18, United States Code, Sections 1591(a), (b)(2), and (c).

(Title 18, United States Code, Section 1594(c).)

COUNT TWO

(Sex Trafficking of a Minor)

4. In or about 2015, in the Southern District of New York and elsewhere, MARIA SOLY ALMONTE, a/k/a "Soly Almonte," a/k/a "Soly La Fuerte," a/k/a "SoSo," a/k/a "SoSo Wavy," a/k/a "Soly Montana," VETTHYA ALCIUS, a/k/a "Theiya Cole," DAWITT DYKES, a/k/a "Daweezy," a/k/a "Dawezzy," DARLENE DELEON, and GABRIELY M. JOSE, a/k/a "Gabriela Vuitton," a/k/a "Gabby," the defendants, willfully and knowingly, in and affecting interstate and foreign commerce, did recruit, entice, harbor, transport, provide, obtain, maintain, advertise, patronize, and solicit by any means a person, and did benefit, financially and by receiving anything of value, from participating in a venture which had engaged in any such act, and having had a reasonable opportunity to observe such person, knowing and in reckless disregard of the fact that the person had not attained the age of 14 years and would be caused to engage in a commercial sex act, and did aid and abet the same, to wit MARIA SOLY ALMONTE, ALCIUS, DYKES, DELEON, and JOSE worked at and operated a brothel that employed an individual who was less than 14 years old ("Victim-1"), who was then caused to engage in at least one commercial sex act that benefitted MARIA SOLY ALMONTE, ALCIUS, DYKES, DELEON, and JOSE, financially.

(Title 18, United States Code, Sections 1591(a), (b)(1), and 2.)

COUNT THREE

(Use of Interstate Commerce to Promote Unlawful Activity)

5. From at least in or about 2014, up to and including in or about June 2016, in the Southern District of New York and elsewhere, MARIA SOLY ALMONTE, a/k/a "Soly Almonte," a/k/a "Soly La Fuerte," a/k/a "SoSo," a/k/a "SoSo Wavy," a/k/a "Soly Montana," VETTHYA ALCIUS, a/k/a "Theiya Cole," DAWITT DYKES, a/k/a "Daweezy," a/k/a "Dawezzy," MARIA MAGDALENA ALMONTE, DARLENE DELEON, and GABRIELY M. JOSE, a/k/a "Gabriela Vuitton," a/k/a "Gabby," the defendants, did use and cause to be used facilities in interstate and foreign commerce, with the intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of an unlawful activity, and thereafter performed and attempted to

perform an act to promote, manage, establish and carry on, and to facilitate the promotion, management, establishment and carrying on of such unlawful activity, to wit, MARIA SOLY ALMONTE, ALCIUS, DYKES, MARIA MAGDALENA ALMONTE, DELEON, and JOSE used a cellular phone and the Internet to promote, manage, establish, and carry on a criminal business engaged in sex trafficking and prostitution, and promoting prostitution in violation of New York Penal Law §§ 230.00, 230.20, 230.25, 230.30, and 230.32.

(Title 18, United States Code, Sections 1952(a)(3) and 2.)

COUNT FOUR
(Enticement of a Minor)

6. In or about summer 2015, in the Southern District of New York, VETTHYA ALCIUS, a/k/a "Theiya Cole," the defendant, willfully and knowingly did use a facility and means of interstate or foreign commerce to persuade, induce, entice, and coerce an individual who had not attained the age of 18 years to engage in sexual activity for which a person can be criminally charged under New York Penal Law §§ 230.20 and 230.25, and attempted to do so, to wit, ALCIUS used Facebook to induce a minor to come to a brothel to engage in prostitution.

(Title 18, United States Code, SectionS 2422(b) and 2.)

COUNT FIVE
(Receipt of Child Pornography)

7. In or about autumn 2015, in the Southern District of New York and elsewhere, VETTHYA ALCIUS, a/k/a "Theiya Cole," the defendant, knowingly did receive and attempt to receive material that contains child pornography that had been mailed, and using a means and facility of interstate and foreign commerce shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, to wit, ALCIUS received chat communications over the Internet containing sexually explicit pictures of a child.

(Title 18, United States Code, Section 2252A(a)(2)(B).)

COUNT SIX
(Possession of Child Pornography)

8. In or about autumn 2015, in the Southern District of New York and elsewhere, VETTHYA ALCIUS, a/k/a "Theiya Cole," the

defendant, knowingly did possess and access with intent to view, and attempt to possess and access with intent to view, a book, magazine, periodical, film, videotape, computer disk, and other material that contained an image of child pornography that had been mailed, shipped and transported using a means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce by any means, including by computer, and that was produced using materials that had been mailed, shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, to wit, ALCIUS possessed images of child pornography in her Facebook account.

(Title 18, United States Code, Sections 2252A(a)(5)(B) and 2.)

The bases for my knowledge and the foregoing charges are, in part, as follows:

9. I am a Special Agent with the FBI, and I have been personally involved in the investigation of this matter. I am currently assigned to a squad that is responsible for investigating sex trafficking and related crimes involving the sexual exploitation of minors. This affidavit is based upon my personal participation in the investigation, my examination of reports and records, and my conversations with law enforcement agents and other individuals. Because this affidavit is being submitted for the limited purpose of establishing probable cause, it does not include all the facts that I have learned during the course of my investigation. Where the contents of documents and the actions, statements and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated.

Overview of the Evidence

10. As is set forth in greater detail below, there is probable cause to believe that MARIA SOLY ALMONTE, a/k/a "Soly Almonte," a/k/a "Soly La Fuerte," a/k/a "SoSo," a/k/a "SoSo Wavy," a/k/a "Soly Montana," VETTHYA ALCIUS, a/k/a "Theiya Cole," DAWITT DYKES, a/k/a "Daweezy," a/k/a "Daweezy," MARIA MAGDALEONA ALMONTE, DARLENE DELEON, and GABRIELY M. JOSE, a/k/a "Gabriela Vuitton," a/k/a "Gabby," the defendants, have committed the crimes charged above in connection with their participation in the activities of a brothel (the "Brothel"). In the course of this investigation, other law enforcement officers and I have: conducted an undercover operation into one of the Brothel locations, *infra* ¶ 12, interviewed victims, *infra*

¶ 13, and reviewed Facebook accounts used by victims and the defendants, *infra* ¶¶ 14-15, Backpage advertisements connected to the Brothel, *infra* ¶¶ 16-17, documents from the Administration for Children's Services, *infra* ¶ 20, law enforcement databases, *infra* ¶ 21, and the contents of cellular telephones, *infra* ¶ 23.

11. The evidence shows, among other things, that from at least in or about 2015 through at least in or about 2016, MARIA SOLY ALMONTE, a/k/a "Soly Almonte," a/k/a "Soly La Fuerte," a/k/a "SoSo," a/k/a "SoSo Wavy," a/k/a "Soly Montana," the defendant, ran a Brothel at several different apartments and houses in the Bronx. The Brothel employed minor victims and adult women, including MARIA SOLY ALMONTE, VETTHYA ALCIUS, a/k/a "Theiya Cole," MARIA MAGDALENA ALMONTE, DARLENE DELEON, and GABRIELY M. JOSE, a/k/a "Gabriela Vuitton," a/k/a "Gabby," the defendants, as sex workers, and advertised on the internet through Backpage. MARIA SOLY ALMONTE, MARIA MAGDALENA ALMONTE, and DELEON each lived in at least one of the Brothel locations during the relevant time period. ALCIUS and DELEON both were involved in recruiting minor victims to engage in prostitution. DYKES provided security at one of the brothel locations at which minors worked, and later offered to provide sex workers for MARIA SOLY ALMONTE.

NYPD Undercover Operation

12. Based on my conversations with New York City Police Department ("NYPD") officers (the "Officers") and my review of NYPD reports, I have learned, in substance and in part, the following:

a. In or about September 2015, the NYPD received a report that a child under 14 years of age ("Victim-1") was working as a sex worker at a brothel located at or about Webster Avenue and 170th Street in the Bronx, New York ("Webster and 170th").

b. On or about September 15, 2015, the NYPD conducted an undercover investigation into this report of child sexual exploitation, which included the following in substance and in part.

i. The NYPD identified an online advertisement at the webpage Backpage.com that the Officers believed to advertise the brothel at which Victim-1 had worked. The advertisement included a phone number ("Phone Number-1") and provided a location at Webster and 170th.

ii. The Officers, acting undercover, called Phone Number-1 and set up an appointment at the Brothel. They were quoted a price for the requested services and were instructed to go to Webster and 170th.

iii. After arriving at Webster and 170th, the Officers called Phone Number-1 again. They were directed to an apartment in a building located in the vicinity of Webster and 170th ("Webster Brothel-1").

iv. The Officers entered Webster Brothel-1 and made arrangements to have sex for money with three female occupants. After making the arrangements, the Officers arrested several of Webster Brothel-1's occupants, including VETTHYA ALCIUS, a/k/a "Theiya Cole," and DAWITT DYKES, a/k/a "Daweezy," a/k/a "Dawezzy," the defendants.

Victim Statements

13. Based on my interviews of sex trafficking victims, I have learned, in substance and in part, the following:

a. MARIA SOLY ALMONTE, a/k/a "Soly Almonte," a/k/a "Soly La Fuerte," a/k/a "SoSo," a/k/a "SoSo Wavy," a/k/a "Soly Montana," the defendant, ran the Brothel from at least in or about 2015 through at least in or about 2016. The Brothel changed locations several times, and employed women and girls to engage in sexual acts with clients in exchange for money.

b. The Brothel's sex workers included, at various times and at various locations, Victim-1 and at least four other girls under 18 years old ("Victim-2," "Victim-3," "Victim-4," and "Victim-5"), VETTHYA ALCIUS, a/k/a "Theiya Cole," the defendant, MARIA MAGDALENA ALMONTE, and GABRIELY M. JOSE, a/k/a "Gabriela Vuitton," a/k/a "Gabby," the defendant.

c. Each sex worker was required to remit \$20 per half hour of time spent engaging in sexual acts for money to the "house." This money ultimately was given to MARIA SOLY ALMONTE.

d. For a period of time in or about 2015, the Brothel was located in a house in or about the Bronx, New York (the "Bronx House Brothel").

e. For a period of time in or about 2015, the Brothel was located in Webster Brothel-1.

f. For a period of time in or about 2015, the Brothel was located in an apartment in the same building as Webster Brothel-1, but on a different floor ("Webster Brothel-2").

g. For a period of time in or about 2015 and 2016, the Brothel was located in a particular apartment building on West 145 Street in Harlem, New York (the "Harlem Brothel").

h. GABRIELY M. JOSE, a/k/a "Gabriela Vuitton," a/k/a "Gabby," the defendant, brought Victim-1 to Webster Brothel-2 in or about 2015.

i. In or about 2015, Victim-1 engaged in sexual acts for money while working at Webster Brothel-2.

j. In or about 2015, Victim-1 and Victim-2 engaged in sexual acts for money at Webster Brothel-1.

k. In or about 2015, Victim-3 engaged in sexual acts for money at Webster Brothel-2.

l. The fact that Victim-1, Victim-2, and Victim-3 were under 18 was well known to the Brothel's occupants at the various locations at which victims worked.

m. DAWITT DYKES, a/k/a "Daweezy," a/k/a "Dawezzy," the defendant, provided security at Webster Brothel-1. Based on my training and experience, I know that individuals who provide security at brothels typically are paid in cash or receive sexual "favors" from the sex workers as compensation. They intervene if a customer refuses to leave or pay and often act as pimps for the sex workers.

n. DARLENE DELEON, the defendant, resided in Webster Brothel-2. MARIA SOLY ALMONTE paid DELEON to use Webster Brothel-2 for the Brothel's activities.

Facebook Communications

14. I have reviewed Facebook accounts used and maintained by defendants, victims, and others, including MARIA SOLY ALMONTE, a/k/a "Soly Almonte," a/k/a Soly La Fuerte," a/k/a "SoSo," a/k/a "SoSo Wavy," a/k/a "Soly Montana," VETTHYA ALCIUS, a/k/a "Theiya Cole," DAWITT DYKES, a/k/a "Daweezy," a/k/a "Dawezzy," DARLENE DELEON, and GABRIELY M. JOSE, a/k/a "Gabriela Vuitton," a/k/a "Gabby," the defendants. As set forth in

greater detail below, the Facebook accounts I have reviewed contain evidence that MARIA SOLY ALMONTE ran a brothel in or about 2015 and 2016, at which ALCIUS, JOSE, and minor victims worked as sex workers. They also contain evidence that ALCIUS induced a minor victim to participate in prostitution and to send ALCIUS pornographic photographs of the minor victim.

15. Based on my review of Facebook search warrant returns and publically available information from Facebook accounts, I have learned, in substance and in part, the following:

a. MARIA SOLY ALMONTE, a/k/a "Soly Almonte," a/k/a "Soly La Fuerte," a/k/a "SoSo," a/k/a "SoSo Wavy," a/k/a "Soly Montana," the defendant, used and maintained a Facebook account (the "MARIA SOLY ALMONTE Facebook Account"). I have determined that MARIA SOLY ALMONTE used and maintained the MARIA SOLY ALMONTE Facebook Account based on my conversations with victims and my review of profile photographs associated with the account which, based on my review of photographs of MARIA SOLY ALMONTE contained in law enforcement records, appear to be photographs of MARIA SOLY ALMONTE.

b. VETTHYA ALCIUS, a/k/a "Theiya Cole," the defendant, used and maintained a Facebook account (the "ALCIUS Facebook Account"). I have determined that ALCIUS used and maintained the ALCIUS Facebook Account based on my conversations with victims and my review of profile photographs associated with the account which, based on my review of photographs of ALCIUS contained in law enforcement records, appear to be photographs of ALCIUS.

c. DARLENE DELEON, the defendant, used and maintained a Facebook account (the "DELEON Facebook Account"). I have determined that DELEON used and maintained the DELEON Facebook Account based on my conversations with victims and my review of profile photographs associated with the account which, based on my review of photographs of DELEON contained in law enforcement records, appear to be photographs of DELEON.

d. DAWITT DYKES, a/k/a "Daweezy," a/k/a "Dawezzy," the defendant, used and maintained a Facebook account (the "DYKES Facebook Account"). I have determined that DYKES used and maintained the DYKES Facebook Account based on my review of profile photographs associated with the account which, based on

my review of photographs of DYKES contained in law enforcement records, appear to be photographs of DYKES.¹

e. GABRIELY M. JOSE, a/k/a "Gabriela Vuitton," a/k/a "Gabby," the defendant, used and maintained a Facebook account (the "JOSE Facebook Account"). I have determined that JOSE used and maintained the JOSE Facebook Account based on my conversations with victims and my review of profile photographs associated with the account which, based on my review of photographs of JOSE contained in law enforcement records, appear to be photographs of JOSE.

f. I have determined that Victim-1 used and maintained a Facebook account (the "Victim-1 Facebook Account" or a "Victim Facebook Account"²), based on my review of username information and profile photographs associated with the account, which appear to be photographs of Victim-1.

g. I have determined that Victim-3 used and maintained a Facebook account (the "Victim-3 Facebook Account" or a "Victim Facebook Account"), based on my conversations with victims and my review of profile photographs associated with the account, which appear to be photographs of Victim-3.

h. I have determined that Victim-4 used and maintained a Facebook Account (the "Victim-4 Facebook Account" or a "Victim Facebook Account"), based on my conversations with victims and my review of profile photographs associated with the account, which appear to be photographs of Victim-4.

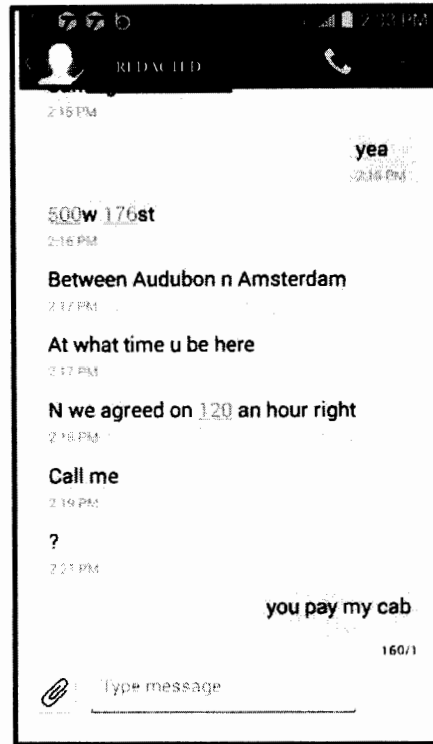
i. I have determined that Victim-5 used and maintained a Facebook Account (the "Victim-5 Facebook Account" or a "Victim Facebook Account"), based on my review of some of the conversations contained in the Facebook account, in which other individuals refer to Victim-5 by name.

j. MARIA SOLY ALMONTE appears to have used Facebook to communicate with and about co-conspirators regarding the Brothel's activities. For example, on or about December 10, 2015, the MARIA SOLY ALMONTE Facebook Account sent a private

¹ A name used on the DYKES Facebook Account is also consistent with another social media account, which appears to be used by DYKES. See *infra* ¶ 22.

² To protect the identities of the minor victims, the victims' Facebook accounts at times are referred to as a "Victim Facebook Account."

message to the ALCIUS Facebook Account, attaching a screenshot of a text message exchange with another individual that, based on my training, experience, and participation in this investigation, appears to have referred to the price that would be charged to a client for a particular amount of time spent with a prostitute:



k. DELEON appears to have used Facebook to communicate with and about co-conspirators and victims concerning the Brothel's activities. For example, in or about autumn 2015, the DELEON Facebook Account and a Victim Facebook Account exchanged private messages discussing MARIA SOLY ALMONTE. DELEON referred to MARIA SOLY ALMONTE as the victim's "mom," and suggested that MARIA SOLY ALMONTE was continuing to engage in "the business," which, based on my training, experience, and participation in this investigation, I understand to refer to the sex trade. Based on my training and experience, I also know that sex workers often refer to "Madams" using maternal nomenclature, despite the absence of a familial relationship.

l. ALCIUS appears to have used Facebook to communicate with co-conspirators and victims concerning the Brothel's activities. For example:

i. In or about summer 2015, a Victim Facebook Account and the ALCIUS Facebook Account exchanged private messages discussing the Brothel's operation. ALCIUS instructed the victim on what time the next day to arrive at the Brothel.

ii. In or about autumn 2015, the ALCIUS Facebook Account and a Victim Facebook Account exchanged private messages which appear to concern prostitution and posting advertisements to Backpage.³ In the course of the exchange, ALCIUS provided her email address (the "ALCIUS Email Address") to the victim to use to post an advertisement to Backpage.

iii. On multiple occasions, the ALCIUS Facebook Account and a Victim Facebook Account exchanged private messages regarding engaging in prostitution at an address consistent with the Harlem Brothel. For example, in or about autumn 2015 ALCIUS told a victim to join her at the Brothel at 145th Street and 7th Avenue.

m. ALCIUS used Facebook to solicit and receive lewd and lascivious images of a victim from the victim. For example:

i. In or about autumn 2015, a Victim Facebook Account sent a private message to the ALCIUS Facebook Account stating, in sum and substance, that the Victim Facebook Account's user was not yet 18 years old.

ii. In or about autumn 2015, the ALCIUS Facebook Account sent a private message to the same Victim Facebook Account referenced in paragraph 15(m)(i) asking for photographs of the victim in the shower. The Victim Facebook Account responded by sending a private message to the ALCIUS Facebook Account attaching a nude photograph of the victim depicting the victim's breasts and genitalia.

n. In or about 2015 and 2016, DYKES exchanged private Facebook messages with co-conspirators concerning the Brothel. For example:

i. On or about September 30, 2015, the DYKES Facebook Account and the ALCIUS Facebook Account exchanged private messages concerning why ALCIUS had not been around the Brothel. The ALCIUS Facebook Account explained "[c]ause I'm not

³ As discussed below, Backpage is an online classifieds website that includes advertisements for escorts. See *infra* ¶ 16.

going back never." The DYKES Facebook Account responded "Stop acting like that . . . nobody will touch u."

ii. On or about May 16, 2016, the DYKES Facebook Account and the MARIA SOLY ALMONTE Facebook Account exchanged private Facebook messages that, based on my training and experience, appeared to concern prostitution. The DYKES Facebook Account wrote "Trying start working again i kno ppl that need a job." On or about May 24, 2016, the DYKES Facebook Account sent private messages to the MARIA SOLY ALMONTE Facebook Account containing photographs of women, and stating "Trust me im loyal ill send them to you."

o. In or about 2015, JOSE exchanged private Facebook messages with co-conspirators and victims concerning the Brothel. Other workers at the Brothel also exchanged private messages about JOSE. For example:

i. In or about winter 2015, the JOSE Facebook Account sent a private message to a Victim Facebook Account relaying a message from MARIA SOLY ALMONTE inviting the victim to the Brothel.

ii. In or about winter 2015, the JOSE Facebook Account and a Victim Facebook Account exchanged private messages concerning a "personal client" who was willing to pay each of them \$150.

iii. In or about summer 2015, the ALCIUS Facebook Account and a Victim Facebook Account exchanged private Facebook Messages in which they discussed waiting for "gabby" to arrive to help them post to Backpage.

iv. A Victim Facebook Account exchanged messages with the JOSE Facebook Account in or about summer 2015 indicating that the victim had been working at the Harlem Brothel with MARIA MAGDALENA ALMONTE, the defendant.

Backpage Advertisements

16. Based on my training and experience, I know that Backpage.com is an online classifieds website that features advertisements for, among other things, escorts who engage in sex acts in exchange for money.

17. Based on my review of records of Backpage.com, I have learned, in substance and in part, the following:

a. From at least in or about 2014 through at least in or about June 2016, advertisements that appear to be associated with the Brothel have been posted in the adult entertainment section on Backpage.com. The advertisements contain locations, telephone numbers, email addresses, or photographs associated with MARIA SOLY ALMONTE, a/k/a "Soly Almonte," a/k/a "Soly La Fuerte," a/k/a "SoSo," a/k/a SoSo Wavy," a/k/a "Soly Montana," VETTHYA ALCIUS, a/k/a "Theiya Cole," DAWITT DYKES, a/k/a "Daweezy," a/k/a "Dawezzy," MARIA MAGDALENA ALMONTE, DARELEN DELEON, and GABRIELY M. JOSE, a/k/a "Gabriela Vuitton," a/k/a "Gabby," the defendants. Based on the text of the advertisements, as well as my training, experience, and participation in this investigation, it appears as though the advertisements were posted for the purpose of soliciting commercial sex. For example:

i. In or about summer 2014, an advertisement entitled "Dominican bbw looking for fun"⁴ was posted to Backpage. The advertisement contained a photograph that appears to be of MARIA SOLY ALMONTE and Victim-5. Based on my training and experience, the text of the advertisement suggested that both individuals pictured would provide prostitution services.

ii. On or about March 28, 2015, an advertisement entitled "bbw dominican Spanish mami Bronx incalls 60\$ specials" was posted to Backpage. The advertisement contained a photograph of JOSE. The advertisement listed an apartment building at Webster and 170th as the address and provided Phone Number-1 as the contact number. See *supra* ¶ 12(b)(i).

iii. On or about June 24, 2015, an advertisement entitled "sexy Emily [] and soso working all day in this beautiful Wednesday [] 60\$ specials all day" was posted to Backpage. The advertisement listed a Pennsylvania address and provided Phone Number-1 as the contact number. See *supra* ¶ 12(b)(i).

iv. In or about autumn 2015, an advertisement entitled "only spot open all day and night 60\$ specials" was posted to Backpage. The advertisement listed "1408 Webster 170th" as the address, and provided Phone Number-1 as the contact number. The advertisement contained a photograph that appears to be of Victim-4.

⁴ Based on my training and experience, I know that "bbw" is an acronym that commonly is used in Backpage advertisements and often stands for "big beautiful woman."

v. On or about September 14, 2015, an advertisement entitled "Tia The brownskin hunnie is Available, come here Daddy" was posted to Backpage using the ALCIUS Email Address. See *supra* ¶ 15(1)(ii). The advertisement contained a photograph of ALCIUS. The advertisement listed Webster and 170th as the address and provided Phone Number-1 as the contact number.

vi. On or about September 15, 2015, an advertisement entitled "In call sexy taysia bottom doing in calls" was posted to Backpage. The advertisement listed Webster and 170th as the address, and provided Phone Number-1 as the contact number. The advertisement was uploaded from a particular Internet Protocol ("IP") address ("IP Address-1").

vii. On or about September 16, 2015, an advertisement entitled "Sexy kittens working all day call me now" was posted to Backpage. The advertisement listed "1408 Webster 170" as the address, and provided a particular phone number ("Phone Number-2") as the contact number.

viii. On or about September 18, 2015, an advertisement entitled "Hi! [] I'm Emily [] Thick and Sexy" was posted to Backpage. The advertisement listed 145 7th Avenue as the address, which is consistent with the location of the Harlem Brothel.

ix. On or about October 25, 2015, an advertisement entitled "outcalls am too good at what i do please call me bbw for this good cold" was posted to Backpage. The advertisement listed the location as Webster Avenue in the Bronx. One of the photographs included in the advertisement appears to be a photograph of DELEON.

x. On or about November 20, 2015, an advertisement entitled "Emily back in town \$60 incall special" was posted to Backpage. The advertisement was posted by an account with an email address that appears to be used by DYKES, (the "Dykes Email Address"). See *infra* ¶ 22. One of the photographs contained in the advertisement is the same as a photograph that DYKES sent to MARIA SOLY ALMONTE via Facebook on or about May 24, 2016. See *supra* ¶ 15(n)(ii).

xi. On or about June 28, 2016, an advertisement entitled "sexy bad mature mamis Dominican 60\$ in falls" was posted to Backpage. The advertisement provided "211 west 145 7th" as the address, which is consistent with the location of

the Harlem Brothel. Based on my review of Facebook search warrant returns, publically available Facebook pages, and criminal history records, it appears that the advertisement contains photographs of MARIA SOLY ALMONTE and MARIA MAGDALENA ALMONTE. One of the photographs on this Backpage advertisement is the same as the publically available Facebook profile photograph associated with the MARIA SOLY ALMONTE Facebook Account.

IP Addresses, Phone Numbers, and Brothel Locations

18. I have compared the IP addresses associated with the Facebook returns I have reviewed, *see supra* ¶¶ 14-15, to the IP addresses associated with the Backpage returns I have reviewed. Based on those comparisons, I have learned, in substance and in part, that DARLENE DELEON, the defendant used IP Address-1 to sign onto her Facebook account over 150 times. As noted above, IP Address-1 was used to post an advertisement to Backpage on or about September 15, 2015, which offered prostitution services at Webster and 170th. *See supra* ¶ 17(a)(vi).

19. I have reviewed records obtained from cellular telephone service providers and have learned, in substance and in part, the following:

a. Phone Number-1 was registered to "Soly Montana" at the Harlem Brothel from on or about December 12, 2014 until up to and including on or about September 15, 2015. Based on my training and experience, this appears to be a variation on the name MARIA SOLY ALMONTE, a/k/a "Soly Almonte," a/k/a "Soly La Fuerte," a/k/a "SoSo," a/k/a SoSo Wavy," a/k/a "Soly Montana," the defendant.

b. Phone Number-2 also was registered to "Soly Montana" at the Harlem Brothel from on or about August 26, 2015, through at least in or about February 2016.

20. I have reviewed records from the New York City Administration for Children's Services ("ACS") and have learned, in substance and in part, the following:

a. DARLENE DELEON, the defendant, resided at Webster Brothel-2 beginning in or about April 2015.

b. On or about August 6, 2015, ACS received a complaint that DELEON was running a prostitution ring in her apartment while her children were present. The complainant reported that lines often formed in the hallway as men waited to

enter the apartment. Representatives from ACS visited DELEON at Webster Brothel-2 and discussed the complaint with her.

c. MARIA MAGDALENA ALMONTE, the defendant, resided in an apartment in the same apartment building as the Harlem Brothel beginning in or about April 2015.

d. DAWITT DYKES, a/k/a "Daweezy," a/k/a "Dawezzy," the defendant, resided at Webster Brothel-1 in or about January 2016.

21. I have reviewed law enforcement databases and have learned, in substance and in part, that beginning in or about May 2015, MARIA SOLY ALMONTE, a/k/a "Soly Almonte," a/k/a "Soly La Fuerte," a/k/a "SoSo," a/k/a "SoSo Wavy," a/k/a "Soly Montana," the defendant, resided in an apartment in the same apartment building as the Harlem Brothel with MARIA MAGDALENA ALMONTE, the defendant.

22. Based on my review of a publically available social media website, I have learned that the DYKES Email Address, see *supra* ¶ 17(a)(x), is the contact email address for a social media account containing numerous photographs of DAWITT DYKES, a/k/a "Daweezy," a/k/a "Dawezzy," the defendant. The name used on the social media account is the same as a name that has been used on the DYKES Facebook Account.

23. Based on my review of the contents of the cellular telephone associated with Phone Number-1 ("Phone-1"), which was recovered from Webster Brothel-1 and searched pursuant to a search warrant, I have learned, in substance and in part, the following:

a. Phone-1 was used to visit the website Backpage.com more than one hundred times.

b. Phone-1 contained images of advertisements that have been posted to Backpage.com.

c. Phone-1 contained sexually provocative images of women, including at least one image of VETTHYA ALCIUS, a/k/a "Theiya Cole," the defendant, which was used in an advertisement posted on Backpage on or about September 14, 2015. See *supra* ¶ 17(a)(v).

d. Phone-1's contacts included DAWITT DYKES, a/k/a "Daweezy," a/k/a "Dawezzy," the defendant.

e. Phone-1 contained text message exchanges concerning prostitution. For example, on or about September 15, 2015, the following exchanges occurred:


Unknown Number-1: Where should I meet you at?
Phone-1: 170 and Webster

Unknown Number-2: Ya stoy aqui [I am here]
Phone-1: come up to [the floor on which
Webster Brothel-1 was located]

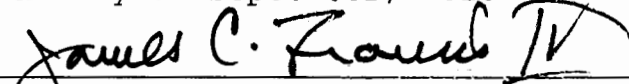
Unknown Number-3: Babe you available
Unknown Number-3: And how much is for two girl
Phone-1: Yea

. . .
Phone-1: 60 quick. 80 half. 140 hour.

WHEREFORE, the deponent respectfully requests that a warrants be issued for the arrest of MARIA SOLY ALMONTE, a/k/a "Soly Almonte," a/k/a "Soly La Fuerte," a/k/a "SoSo," a/k/a "SoSo Wavy," a/k/a "Soly Montana," VETTHYA ALCIUS, a/k/a "Theiya Cole," DAWITT DYKES, a/k/a "Daweezy," a/k/a "Dawezzy," MARIA MAGDALENA ALMONTE, DARLENE DELEON, and GABRIELY M. JOSE, a/k/a "Gabriela Vuitton," a/k/a "Gabby," the defendants, and that they be imprisoned or bailed, as the case may be.


EVAN NICHOLAS
Special Agent
Federal Bureau of Investigation

Sworn to before me this
2nd day of September, 2016


THE HONORABLE JAMES C. FRANCIS IV
UNITED STATES MAGISTRATE JUDGE
SOUTHERN DISTRICT OF NEW YORK